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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,
Individual and Representative Plaintiff,

v.

META PLATFORMS, INC.,
Defendant.

Consolidated Case No. 3:23-cv-03417-VC (TSH)

**STIPULATION RE: JOINT DISCOVERY
BRIEF RE PRIVILEGE LOG ISSUES AND
[PROPOSED] ORDER**

1 Pursuant to Civ. L.R. 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden,
2 Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi
3 Coates, Laura Lippman, Matthew Klam, Junot Díaz and Lysa Terkeurst (“Plaintiffs”); and Defendant
4 Meta Platforms, Inc. (“Defendant;” together with Plaintiffs, “Parties”) by and through their respective
5 counsel stipulate:

6 WHEREAS, on September 25, 2024, the Court held a telephonic discovery conference, where the
7 Court set a deadline for the Parties to file joint discovery briefs regarding issues relating to the parties’
8 respective privilege logs by October 3, 2024;

9 WHEREAS, the Parties separately continue to meet and confer regarding Plaintiffs’ privilege
10 logs, which may obviate some or all of the issues that Meta had intended to put to the Court;

11 WHEREAS, Meta has agreed to provide an amended privilege log on October 7, 2024, which
12 may obviate some or all of the issues that would have been put to the Court;

13 WHEREAS, all Parties agree that Plaintiffs reserve their right to challenge the adequacy of Meta’s
14 forthcoming privilege log as well as to address any substantive issues with the claims of privilege and/or
15 attorney work product asserted therein;

16 WHEREAS, all Parties agree that Meta reserves its right to raise disputes regarding Plaintiffs’
17 privilege logs after the conclusion of ongoing meet and confers, as well as to address any substantive
18 issues with the claims of privilege and/or attorney work product asserted therein;

19 WHEREAS, in light of the foregoing, there is currently no issue ripe for review by the Court on
20 the Parties’ respective privilege logs;

21 WHEREAS, all Parties agree that the current briefing deadline should be vacated and that the
22 Parties will inform the Court if they are unable to informally resolve their current disputes with respect
23 to the privilege logs;

24 WHEREAS, under the existing case management schedule fact discovery closed on September
25 30, 2024, with the exception of certain depositions, and, absent court order, the deadline to file motions
26 to compel discovery under the September 30 discovery cut-off is October 7, 2024 (Civil L.R. 37-3);

27 WHEREAS, the Parties jointly request a 14-day extension of time within which to raise issues
28 with their respective privilege logs until after they have had a reasonable opportunity to meet and confer;

1 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs
2 and Defendant, as represented by their undersigned counsel, that:

- 3 (1) the Parties do not intend to file a joint letter brief regarding their respective privilege log
4 concerns today, October 3, 2024;
- 5 (2) the Parties jointly request an extension of the deadline under the Local Rules to raise disputes
6 concerning their responsive privilege logs, including the adequacy of the parties' logs as well
7 as any substantive issues with the claims of attorney-client privilege and attorney work
8 product asserted therein, to October 21, 2024; and
- 9 (3) the Parties agree that nothing in this Stipulation shall have the effect of extending any other
10 aspect of the case schedule entered by the Court and that this Stipulation shall not be used as
11 a basis to seek an extension of any other deadlines in the case.
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1 Dated: October 3, 2024

Respectfully Submitted,

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Amy Keller

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1 Dated: October 3, 2024

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Attorneys for Defendant
META PLATFORMS, INC.

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby extends the deadline to raise discovery disputes concerning their responsive privilege logs, including claims of attorney-client privilege and attorney work product, to October 21, 2024.

IT IS SO ORDERED.

Date: _____

Hon. Thomas S. Hixson, USMJ